

## **EXHIBIT 2**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA**

In re:	)	Chapter 11
	)	
MERCY HOSPITAL, IOWA CITY,	)	Case No. 23-00623 (TJC)
IOWA, <i>et al.</i>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

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**DECLARATION OF ANGELA BRENIER**

I, Angela Brenier, pursuant to 28 U.S.C. § 1746, declare the following under penalty of perjury:

1. I am a Paralegal and a Certified eDiscovery Specialist with the law firm of Belin McCormick, P.C.

2. I received my certification as a Certified eDiscovery Specialist from the Association of Certified E-Discovery Specialists in 2013. I have over 20 years' experience as a Paralegal and have specialized in eDiscovery since 2008. In addition to the certification, I have attended numerous continuing education courses over the years. Additionally, I have presented on eDiscovery topics to several organizations including the Des Moines Area Community College in Ankeny, Iowa, and Drake Law School in Des Moines, Iowa. I also have a Reviewer Certification in the eDiscovery Platform Everlaw.

3. I was asked to assist with the Electronically Stored Information ("ESI") collection, searches and production in the above-captioned matter. I thoroughly reviewed and followed the Court's Order at Docket No. 1854 dated 3/25/2025.

4. I worked with Brandon Gladstone, Manager of Electronic Discovery and Data Loss Prevention, in the Trinity Health Enterprise Information Security Department to collect ESI. We collected three datasets.

- a. Dataset 1 included Trinity emails and ShareFile documents. This search was for the custodians identified in the Court's order: Dave Vellinga, Bob Ritz, Jack Dunsenberry, Jeff Rooney, Douglas Davenport, Sean Williams, Michael Trachta, Michael Wegner, Rob Heen, Jodie Roettger. This dataset includes the OneDrive platform used for storing Trinity's current network files. Once the custodians were targeted, the search terms "MIC" OR "Mercy Hospital Iowa City" were executed. This search returned 394 documents, and all 394 documents were reviewed. Of this set only 74 documents were marked responsive and were produced. Responsive documents were produced at **MERCY ESI000001-MERCY ESI000261, MERCY ESI000642-MERCY ESI000647, MERCY ESI007004-MERCY ESI007009, MERCY ESI007976-MERCY ESI007987**. Given the limited number of responsive documents located via custodian searches, we conducted additional searches designed to locate potentially responsive documents.
- b. Dataset 2 included a targeted collection of two parent folders that the client identified as potentially containing responsive documents. The two folders targeted on SharePoint were "DSM Admin" and "DSM MHN." Mr. Gladstone searched the two folders for "MIC" or "Mercy Hospital Iowa City" and provided those results to me in full ("Dataset 2"). Dataset 2 included over 40,000 total documents and was 12GB in native size. Once Dataset 2 was ingested into our eDiscovery platform Everlaw, I ran the specific search terms listed in the Court's March 25, 2025 Order. These

searches resulted in 1,906 documents that were reviewed and 303 of those documents from Dataset 2 were deemed responsive. Responsive documents were produced at **MERCY ESI000262-MERCY ESI000641, MERCY ESI000648-MERCY ESI006879, MERCY ESI007037-MERCY ESI007975, MERCY ESI007992-MERCY ESI008013.**


- c. Dataset 3 consists of PST files (mercyhealth.com email domain) and OneDrive Custodian Files. The only custodians with files available for this search were Mike Trachta, Jack Dusenbery and Robert Ritz. Mr. Gladstone uploaded all the data for these custodians for the date range 2017-2023. We ran the more complex search terms from the Court's March 25, 2025 Order within our Everlaw platform. The upload contained 101,710 total documents from the PST file and 2,011 documents from the custodian OneDrive files. The searches resulted in 227 documents that were reviewed and 13 of those documents were deemed responsive. Responsive documents were produced at **MERCY ESI006901-MERCY ESI007003, MERCY ESI007988-MERCY ESI007991, MERCY ESI008033-MERCY ESI008041.**

5. A load file containing the following metadata fields was included with all of our ESI productions: Begin Bates, End Bates, Pages, BeginFamily, EndFamily, Placeholder, File Extension, NativePath, TextPath, Author, Bcc, Cc, Date, Date Sent, File Path, Filename, From, MD5 Hash, SHA1 Hash, Subject, Title, To, All Custodians, Date Created, Date Modified. This file provides Plaintiff information about when and by whom the file was created. For example, using this information, Plaintiff can identify the Author of a document by looking at the Author

field, the location of where the document was saved in its ordinary course of business by looking at the FilePath field, and the date a document was created or modified by looking at the Date Created or Date Modified fields.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 7th day of July, 2025.

  
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Angela J. Brenizer